

ERIC W. SWANIS, ESQ.
Nevada Bar No. 006840
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: swanise@gtlaw.com
Counsel for Defendant
AAP Implants, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

HOWARD RONALD TUBIN,

Plaintiff,

v.

DEPUY SYNTHES SALES, INC., d/b/a
DEPUY SYNTHES JOINT
RECONSTRUCTION; DEPUY SYNTHES
INC.; JOHNSON & JOHNSON; DEPUY
ORTHOPAEDICS, INC.; STRYKER
CORPORATION; HOWMEDICA
OSTEONICS CORPORATION d/b/a
STRYKER ORTHOPAEDICS; AAP
IMPLANTS, INC.; DOES 1 through 15,
inclusive; and ROE BUSINESS ENTITIES 1
through 15, inclusive,

Defendants.

CASE NO. 2:20-cv-02347-APG-DJA

**STIPULATION AND ORDER TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO COMPLAINT**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, between Plaintiff HOWARD RONALD TUBIN (“Tubin” or “Plaintiff”), by and through his counsel of record, Bertoldo Baker Carter & Smith, and Defendant, AAP IMPLANTS, INC. (“AAP” or “Defendant”), by and through its counsel of record, Greenberg Traurig, LLP, that the deadline within which

1 Defendant may file and serve a response to Plaintiff's operative Complaint is hereby
2 extended from February 25, 2021 to **March 29, 2021** so that the parties may assess whether
3 AAP is a properly named defendant in this action.

4 **IT IS SO STIPULATED AND AGREED.**

5 Dated this 25th day of February 2021.

Dated this 25th day of February 2021.

6 BERTOLDO BAKER CARTER &
7 SMITH

GREENBERG TRAURIG, LLP

8 By: /s/ Lindsay K. Cullen

By: /s/ Eric W. Swanis

9 LINDSAY K. CULLEN, ESQ.

ERIC W. SWANIS, ESQ.

10 Nevada Bar No. 12364

Nevada Bar No. 006840

11 BRETT A. CARTER, ESQ.

10845 Griffith Peak Drive

12 Nevada Bar No. 5904

Suite 600

13 7408 West Sahara Avenue

Las Vegas, Nevada 89135

14 Las Vegas, Nevada 89117

Telephone: (702) 792-3773

15 Telephone: (702) 228-2600

Facsimile: (702) 792-9002

16 Facsimile: (702) 228-2333

swanise@gtlaw.com

17 Lindsay@NVLegalJustice.com

Counsel for Defendant

18 Carter@NVLegalJustice.com

AAP Implants, Inc.

19 ***Counsel for Plaintiff***

20 ***Howard Ronald Tubin***

21 **IT IS SO ORDERED.**

22 

23 DANIEL J. ALBREGTS

24 UNITED STATES MAGISTRATE JUDGE

25 DATED: February 26, 2021

CERTIFICATE OF SERVICE

I hereby certify that on **February 25, 2021**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service:

LINDSAY K. CULLEN, ESQ.

Lindsay@NVLegalJustice.com

Nevada Bar No. 12364

BRETT A. CARTER, ESQ.

Carter@NVLegalJustice.com

Nevada Bar No. 5904

BERTOLDO BAKER CARTER & SMITH

7408 West Sahara Avenue, Las Vegas, Nevada 89117

Telephone: (702) 228-2600

Counsel for Plaintiff

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP